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PIONEER INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and  
UCA GENERAL INSURANCE SERVICES

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CENTURY-NATIONAL INSURANCE  
COMPANY, a California corporation,  
PACIFIC PIONEER INSURANCE GROUP,  
INC., a Delaware corporation, PACIFIC  
PIONEER INSURANCE COMPANY, a  
California corporation, and UCA GENERAL  
INSURANCE SERVICES, a California  
corporation,

Plaintiffs,

vs.

DOUGLAS J. GARDNER, ESQ., an  
individual, DOUGLAS J. GARDNER, LTD.,  
a Nevada domestic professional corporation,  
RANDS & SOUTH, LTD., a Nevada domestic  
professional corporation, ALPS PROPERTY  
& CASUALTY INSURANCE COMPANY, a  
Montana corporation, DOES 1 through 20,  
inclusive

Defendants.

Case No.: 2:18-cv-02090-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE JOINT  
PRE-TRIAL ORDER  
(Second Request)**

1 The Parties through their respective counsel of record hereby stipulate and agree as  
2 follows:

3 This action arises from a dispute over Plaintiffs' claims of legal malpractice, breach of  
4 contract, and fraud in the defense to judgment and post-judgment settlement of a multi-million  
5 dollar underlying action for personal injury damages.

6 On October 12, 2021, the Court granted (ECF No. 114) the Parties' First Request for  
7 Stipulation and Order to Extend Deadline to File Joint Pre-Trial Order (ECF No. 113), to  
8 accommodate the Parties' attempts to resolve this action through mediation.

9 The Parties' First Request stipulated to extend the Joint Pre-Trial Order deadline to 30  
10 days after completion of mediation.

11 The Parties participated in and completed an all-day mediation on January 27, 2022  
12 before the Honorable Judge Jackie Glass (Ret.) of Advanced Resolution Management. The  
13 Parties did *not* settle their disputes or resolve the instant litigation through mediation.

14 The Joint Pre-Trial Order deadline is therefore Saturday, February 26, 2022.

15 Wherefore, the Parties hereby stipulate and request that the deadline to file the Joint Pre-  
16 Trial Order be extended 30 days from the current deadline, to Monday, March 28, 2022, to  
17 facilitate the Parties' efforts in meeting and conferring on and preparing a thorough Joint Pre-  
18 Trial Order that addresses the extensive number of issues and evidence to be addressed at trial.

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1 This is the second stipulation for extension of time to file the proposed Joint Pre-Trial Order.

2 IT IS SO STIPULATED.

3 Dated February 18, 2022

4 PYATT SILVESTRI

MARSHALL & ASSOCIATES

5  
6 /s/ James P.C. Silvestri  
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Attorney for Defendant ALPS

19 **ORDER**

20 **IT IS SO ORDERED**

21 **DATED:** 12:46 pm, February 22, 2022

22  
23 

24 **BRENDA WEKSLER**  
25 **UNITED STATES MAGISTRATE JUDGE**  
26  
27  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18th day of February 2022, I served the above **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE JOINT PRE-TRIAL ORDER** through CM/ECF system of the United States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

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/s/ Kim K. Ranck  
An Employee of Marshall & Associates